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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

UBER TECHNOLOGIES, INC.;  
OTTOMOTTO LLC; OTTO TRUCKING  
LLC,

Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF FELIPE  
CORREDOR IN SUPPORT OF  
DEFENDANTS UBER TECHNOLOGIES,  
INC. AND OTTOMOTTO LLC'S  
ADMINISTRATIVE MOTION TO FILE  
UNDER SEAL PORTIONS OF THEIR  
MOTION FOR SUMMARY JUDGMENT  
AND EXHIBITS THERETO**

1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to  
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,  
4 LLP, counsel for the Plaintiff Waymo LLC ("Waymo"). I have personal knowledge of the matters set  
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Defendants Uber Technologies, Inc. and  
7 Ottomotto, LLC's Administrative Motion to File Under Seal Portions of Their Motion for Summary  
8 Judgment and Exhibits Thereto (the "Administrative Motion"). The Administrative Motion seeks an  
9 order sealing highlighted portions of Defendants' Motion for Summary Judgment ("Defendants'  
10 Motion"), Exhibits 9-11 and 15 to the Declaration of Michelle Yang ("Yang Exhibits"), the  
11 Declaration of James Haslim, the Declaration of Brent Schwarz, and Exhibits 1-2 and 4-5 to the  
12 Declaration of Shane Brun ("Brun Exhibits"), as well as the entirety of Yang Exhibits 2-4, 8, and 17-  
13 18 and Brun Exhibits 3 and 6-7.

14 3. The portions of Defendants' Motion marked in red boxes, certain portions of Yang  
15 Exhibit 3, the green highlighted portions of Yang Exhibits 9-11, and 15 and of Brun Exhibit 2, and the  
16 entirety of Yang Exhibit 8 and Brun Exhibits 6-7 contain or refer to trade secret information, which  
17 Waymo seeks to seal.

18 4. Defendants' Motion (portions marked in red boxes in version filed herewith), Yang  
19 Exhibit 3 (pages 18-20) Yang Exhibit 8 (entire document), Yang Exhibits 9-11 and 15 (green  
20 highlighted portions), Brun Exhibit 2 (green highlighted portions, except for portion at 5:15), and  
21 Brun Exhibits 6-7 (entire documents) contain, reference, and/or describe Waymo's asserted trade  
22 secrets or information that, from context, tends to disclose Waymo's asserted secrets, including as  
23 misappropriated by Defendants. The information Waymo seeks to seal includes the confidential  
24 design and functionality of Waymo's proprietary autonomous vehicle system, including its LiDAR  
25 designs, which Waymo maintains as secret. I understand that these trade secrets are maintained as  
26 secret by Waymo (Dkt. 25-47) and that the trade secrets are valuable to Waymo's business (Dkt. 25-  
27 31). The public disclosure of this information would give Waymo's competitors access to  
28 descriptions of the functionality or features of Waymo's autonomous vehicle system. If such

1 information were made public, I understand that Waymo's competitive standing would be  
2 significantly harmed.

3 5. In the event the Court were to deny Velodyne's request to keep its confidential  
4 information under seal, Waymo may support sealing additional portions of Defendants' Motion and  
5 portions of Yang Exhibit 17.

6 6. Waymo's request to seal is narrowly tailored to those portions of Defendants' Motion,  
7 Yang Exhibits 3, 8-11, and 15, and Brun Exhibits 2 and 6-7 that merit sealing.

8  
9 I declare under penalty of perjury under the laws of the State of California and the United  
10 States of America that the foregoing is true and correct, and that this declaration was executed in San  
11 Francisco, California, on September 5, 2017.

12 By /s/ Felipe Corredor

13 Felipe Corredor

14 Attorneys for WAYMO LLC

15  
16 **ATTESTATION**

17 In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this  
18 document has been obtained from Felipe Corredor.

19  
20 By: /s/ Charles K. Verhoeven

21 Charles K. Verhoeven